

**ISSUE MATRIX FOR DRAFT COMPATIBILITY DETERMINATION
SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2**

#	NAME	ADDRESS or EMAIL	Date RCVD	ISSUES	N	P	AGENCY RESPONSE
1	Peter Bengston	1280 E. Paseo Pavon Yuma, AZ 85718	12/3/06	1. Reduction of quality and quantity of habitats on Kofa NWR (Refuge). 2. Negative effects on bighorn sheep during lambing period. 3. Negative impacts on reptiles. 4. Negative impacts on migratory birds. 5. Destruction of pristine desert landscape. 6. Project would diminish recreational value of the Refuge. 6. Irreparable and unmitigable visual impacts.	X		Comments consistent with the draft CD. No further action required.
2	Mark D. Eberle	Mark.D.Eberle@nap.02.usace.army.mil	12/5/06	1. Reduction of quality and quantity of habitats on the Refuge.	X		Comments consistent with the draft CD. No further action required.
3	Robert A. Witzeman	Maricopa Audubon Society 4619 E Arcadia Lane Phoenix, AZ 85018 witzeman@cox.net	12/3/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep during lambing period. 3. Destruction of pristine desert landscape. 4. Project would diminish recreational value of the Refuge. 5. Irreparable and unmitigable visual impacts.	X		Comments consistent with the draft CD. No further action required.
4	Thomas E. Fox	yumatom@sprynet.com	12/4/06	1. Do not allow proposed powerline through Kofa NWR (Refuge).	X		Comments consistent with the draft CD. No further action required.
5	Donald Begalke	lakeharquahala@yahoo.com	12/2/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Notes that DPV #1 impacts "were somewhat monstrous and terribly industrial-neither feeling should exist when in a wildlife refuge." 3. Reduction in the quality of the "Refuge" experience. 4. Irreparable and unmitigable visual impacts.	X		Comments consistent with the draft CD. No further action required.
6	Roy M. Emrick	rmemrick@cox.net	12/9/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep during lambing period. 3. Destruction of pristine desert landscape. 4. Irreparable and unmitigable visual impacts. 5. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.

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7	Margery Leach	2609 W. Southern Ave. #338 Yuma, AZ 85282-4234	12/11/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Irreparable and unmitigable visual impacts.	X	Comments consistent with the draft CD. No further action required.
8	Robert Herdliska	2631 W. Prato Way Tucson, AZ 85741	12/13/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep. 3. Negative impacts on reptiles. 4. Negative impacts on migratory birds. 5. Destruction of pristine desert landscape. 6. Irreparable and unmitigable visual impacts. 7. Project would diminish recreational value of the Refuge.	X	Comments consistent with the draft CD. No further action required.
9	Margaret L. Thomas	1084 Paseo Guebabi Rio Rico, AZ 85648	12/10/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep. 3. Negative impacts on reptiles. 4. Negative impacts on migratory birds. 5. Destruction of pristine desert landscape. 6. Irreparable and unmitigable visual impacts. 7. Project would diminish recreational value of the Refuge.	X	Comments consistent with the draft CD. No further action required.
10	John Alcock	75 E. Loyola Drive Tempe, AZ 85282	12/11/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep. 3. Negative impacts on reptiles. 4. Destruction of pristine desert landscape. 5. Irreparable and unmitigable visual impacts. 6. Project would diminish recreational value of the Refuge.	X	Comments consistent with the draft CD. No further action required.
11	Gilbert G. Anaya	U.S. International Boundary and Waterway Commission (USIBWC) The Commons Building C, Suite 100 4171 N. Mesa Street El Paso, TX 79902 http://www.ibwc.state.gov	12/11/06	"Based on the documents, there will be no effect to the USIBWC Yuma Field office projects and USIBWC responsibilities."	X	Comments consistent with the draft CD. No further action required.

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12	Bettina Bickel	9218 N. 51st Dr. Glendale, AZ 85302	12/18/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Negative effects on bighorn sheep during lambing season. 3. Negative impacts on reptiles. 4. Negative impacts on migratory birds. 5. Destruction of pristine desert landscape. 6. Irreparable and unmitigable visual impacts. 7. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.
13	Eleanor Powell	413 S. 21st Avenue Yuma, AZ 85364	12/18/06	1. "As an artist I love to see nature raw, with little intrusion by we the people and our many inventions." 2. Negative effects on bighorn sheep. 3. Negative impacts on reptiles. 4. Negative impacts on migratory birds.	X		Comments consistent with the draft CD. No further action required.
14	Eileen Mitchell	2530 West Berridge Lane, #2 Phoenix, AZ 85017-2206	12/19/06	1. "...I agree with and support the U.S. Fish and Wildlife Service's determination that the DPV #2 is not compatible with our National Wildlife Refuge."	X		Comments consistent with the draft CD. No further action required.
15	Phyllis Rowe	President Emeritus Arizona Consumers Council PO Box 1288 Phoenix, AZ 85001	12/22/06	1. Increase of energy costs to AZ residents. 2. Disturbance to the Wildlife Refuge.	X		1. SCE determined in its Cost Effectiveness Report that "...constructing DPV #2 was found to have a net negative impact of around \$16 to \$20 million per year to Arizona..." (SCE 2004:41). However, analysis of this issue is not within the scope of the CD, and therefore not included in the draft document. 2. Comments on disturbance to wildlife consistent with the draft CD. No further action required.

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16	Douglas R. Newton	4812 South Fair Lane Tempe, AZ 85282	12/22/06	1. Negative effects on bighorn sheep. 2. Negative impacts to archeological sites.	X		1. Comments on impacts to bighorn sheep consistent with draft CD. Not further action required. 2. Based on extensive surveys over the last 30 years it has been determined that the potential of impacts to archeological sites would be negligible. The Services' Regional Archaeologist is in agreement with these findings. The draft CD will be updated to also reflect these findings.
17	Ann L. Truschel	1213 S. Johnson Road Buckeye, AZ 85326 annlouisetruschel@yahoo.com	12/29/06	1. Incompatible with Refuge's mission. 2. Negative impacts on bighorn sheep. 3. Negative impacts on tortoise habitat. 4. Reduction of quality and quantity of habitats on the Refuge. 5. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.
18	Christine L. Oler	207 W. Dahil Road Tucson, AZ 85705 cloler@cox.net	12/27/06	1. Incompatible with the Refuge's mission. 2. Reduction of quality and quantity of habitats on the Refuge. 3. Project would diminish recreational value of the Refuge. 4. Negative impacts on bighorn sheep. 5. Negative impacts on tortoise habitat.	X		Comments consistent with the draft CD. No further action required.
19	Patricia L. Robert	7447 N. 58th Place Paradise Valley, AZ 85253	12/22/06	1. Incompatible with the Refuge's mission. 2. Negative effects on bighorn sheep during lambing season. 3. Negative impacts on bighorn sheep. 4. Negative impacts on tortoise habitat. 5. Potential impacts to animals crossing the roads. 6. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.
20	Ryan Flory	8444 E. Plaza Ave. Scottsdale, AZ	12/22/06	1. Incompatible with the Refuge's mission. 2. Negative effects on bighorn sheep during lambing season. 3. Negative impacts on bighorn sheep. 4. Negative impacts on tortoise habitat. 5. Potential impacts to animals crossing the roads. 6. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.

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21	June P. Payne	4733 E. Cambridge Ave. Phoenix, AZ 85008-1507	12/26/06	1. Negative impacts to vegetation. 2. Negative effects on bighorn sheep. 3. Negative impacts on reptiles. 4. Negative impacts to paleontological resources. 5. Incompatible with the Refuge's mission.	X	1, 2, 3, and 5. Comments consistent with draft CD. No further action required. 4. Based on extensive surveys over the last 30 years it has been determined that the potential of impacts to archeological sites would be negligible. The Services' Regional Archaeologist is in agreement with these findings and the draft CD will be updated accordingly.
22	Tyler Kokjohn	4040 W. El Cortez Trail Glendale, AZ 85310 tkokjo@midwestern.edu	12/22/06	1. Reduction of quality and quantity of habitats on the Refuge. 2. Incompatible with Refuge's mission.	X	Comments consistent with the draft CD. No further action required.
23	Cassandra Carmichael	National Council of Churches Washington Office 110 Maryland Ave, NE, Suite 108 Washington, DC 20002	12/28/06	1. Incompatible with the Refuge's mission.	X	Comments consistent with the draft CD. No further action required.
24	Don & June Hochberg	junedonh@yahoo.com	12/24/06	1. Loss of resources.	X	Comments consistent with the draft CD. No further action required.
25	Cecilia Laspisa	656 N. Sunstream Lane Tucson, AZ 85748	12/22/06	1. Incompatible with the Refuge's mission. 2. Reduction of quality and quantity of habitats on the Refuge. 3. Project would diminish recreational value of the Refuge. 4. Negative impacts on bighorn sheep. 5. Negative impacts on tortoise habitat.	X	Comments consistent with the draft CD. No further action required.

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26	Frank Welsh	welshfi@yahoo.com	12/26/06	1. "It's hard to believe that we would send our power to CA while they send their people here."	X		The FEIS outlines that the Proposed Project will produce an economic benefit to California consumers (not Arizona consumers) of only \$0.61 cents per MWh (p.A-14). The economic analysis was conducted under the assumption that the benefits of accessing Palo Verde generation in the southwest area will continue beyond 2012 (SCE 2004:41). Also, SCE determined in its Cost Effectiveness Report that "...constructing DPV #2 was found to have a net negative impact of around \$16 to \$20 million per year to Arizona..." (SCE 2004:41). However, analysis of this issue is beyond the scope of the CD, therefore no further action is required.
27	Patricia Kutney & Lawrence Sawyer	pamkutney1562@cox.net	12/24/06	1. Negative impacts on wildlife. 2. Negative impacts on vegetation.	X		Comments consistent with the draft CD. No further action required.
28	TW Kreuser	azkreuser2@cox.net	12/24/06	1. "Keep it wild."	X		Comments consistent with the draft CD. No further action required.
29	Patricia Kenyon	8528 S. Shannon Way Yuma, AZ 85365-9509	12/27/06	1. Negative impacts on vegetation. 2. Negative impacts on wildlife.	X		Comments consistent with the draft CD. No further action required.
30	Theresa Johnson	ThrJohn7@aol.com	12/28/06	1. Incompatible with the Refuge's mission.	X		Comments consistent with the draft CD. No further action required.
31	Rudy Dankwort	8121 N. 8th Ave. Phoenix, AZ 85021	12/24/06	1. Negative impacts on bighorn sheep. 2. Negative impacts on wildlife.	X		Comments consistent with the draft CD. No further action required.
32	Lon Stewart	102 E. Kaler Drive Phoenix, AZ 85020	12/22/06	1. Negative impacts on bighorn sheep. 2. Negative impact on desert tortoise. 3. Negative impacts on vegetation. 4. Project would diminish recreational value of the Refuge.	X		Comments consistent with the draft CD. No further action required.

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33	Dian M. Grueneich	Commissioner California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102	12/22/06	1. The route through the Refuge has been determined to be the environmentally preferred route. 2. DPV #2 is a critical addition to California and regional transmission infrastructure. 3. The Refuge only recently indicated that there was a problem with siting DPV #2 in the same corridor as DPV #1. 4. Alternative routes around the Refuge are not environmentally preferred and will unnecessarily delay the construction of DPV #2.	X		1. The Service was not a cooperating agency in BLM's FEIS. Also, the BLM is not responsible for the stewardship of the Refuge. Therefore, BLM's finding that the installation of a 500kV powerline across the Refuge is "environmentally preferred" does not take into account the mission of the Service as it applies to the Refuge and the NWRS. Furthermore, "unless otherwise provided for in law or other legally binding directive, permitting uses of national wildlife refuges is a determination vested by law in the Service," not other Federal and/or state agencies. 65 Fed. Reg. 62484, §2.11(A)(3). 2. The Final Environmental Impact Statement states "No new generation or major transmission facilities would be required if the DVP2 project is not constructed" (p. C-56); and also that "...DVP #2 is primarily driven by SCE's desire to reduce energy costs to California customers, not by a need for improved reliability" (p. C-53). The reported "critical" nature of DPV#2 does not automatically lead USFWS to conclude that DPV #2 is compatible with Refuge purposes. The USFWS position is that other alternative approaches (e.g., wind generation) and routes provided in the FEIS are feasible and should have been evaluated in more detail. 3. The Service indicated in its comments on the FEIS dated August 18, 2006, that the No Project Alternative was preferred by the Refuge. 4. The Service did not have any input into determining the "Environmentally Preferred" route. The I-10 corridor north of the Refuge already contains gas pipelines and has been targeted for utility development. As of December 19, 2006, it was included in the draft location for DOE's West Wide Energy Corridor. Should development proceed in that corridor, then the Refuge would no longer be the environmentally preferred alternative. The Service agrees with the assessment that the selection of an alternative route will add time to initiation and completion of the project.

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34	Gail Acheson	Bureau of Land Management Palm Springs-South Coast Field Office 690 W. Garnet Ave. PO Box 581260 North Palm Springs, CA 92258-1260 (760)251-4800	12/22/06	1. Installation of DPV #2 along side of DPV #1 will allow use of existing access roads. 2. Use of the Administrative Final EIR/EIS to summarize impacts and mitigation measures is not appropriate. 3. Construction impacts on native plants were found to be potentially significant. Mitigation measures will lower the impacts. 4. Introduction of non-native plant species along travel corridors and within the Right-of-Way(ROW). Mitigation measures will lower the impact. 5. Negative impacts on reptile habitat. Mitigation measures will lower the impacts. 6. Negative impacts on bighorn sheep. Mitigation measures will lower the impacts.		X	1. The Proposed Project creates new spur roads, extends existing spur roads, and impacts vegetation inside the ROW on the Refuge. Even with mitigation measures, habitat for reptile and small mammals will be destroyed or their habitat fragmented if the project is implemented. Construction activity on previously undisturbed areas within the ROW would also cause direct mortality to these species when the operation of vehicles and equipment crush them in their burrows. Direct mortality could also occur to those animals that attempt to scavenge reptile and small mammals killed during construction activities, although the disturbance itself may keep them at a safe distance and out of harms way. Indirect impacts might occur to these predatory species from a reduced prey base. 2. The Service has used the BLM's FEIS to supplement the "sound professional judgment" of the Refuge Manager in determining whether or not the proposed use meets the purposes of the Refuge and the mission of the NWRS. The Service also believes that it is appropriate to reference the mitigation measures implemented in the FEIS in the CD as these measures are used to determine the projected level of impact of the activity or action and its significance to the resource under consideration. 3. Mitigation measures proposed in the FEIS focus on the development of a transplanting plan. The Service disagrees that transplanting native plants where ground disturbing activities have occurred reduces the impact to vegetation to a less than significant level. Experience has shown that desert revegetation is extremely difficult to recover. Transplanting sensitive plant species will reduce direct mortality from construction activities but there is no practical mitigation available to restore the proper functioning of the Sonoran Desert vegetation community. Visible scars remain on the Refuge from pipeline installation from the 1950s-1970s and from the construction of DPV #1. The outcomes are expected to be similar for DPV #2. 4. Invasive plant species remain a problem decades after completion of a project, not only from inadvertent introduction or spread due to construction activities but from introduction or spread from increased public use of roads constructed or upgraded for the project. Seed introduced from either cause can remain viable for years. The Refuge is still dealing with populations of Mediterranean grass and Sahara mustard along the pipeline road primarily brought in by vehicle travel along this route. Mitigation is never long-term or widespread enough to adequately address the invasive species issue; therefore it remains a significant issue for the Refuge. 5. Mitigation measures will not stop reptile habitat fragmentation, cover destruction, and population isolation because direct ground disturbance from construction activities would remain an issue at the 85 tower sites and where spur roads were extended and temporary soil and vegetation damage within the ROW cannot be adequately restored to its full habitat function. Direct mortality of reptiles and small mammals being crushed in their burrows by construction activity cannot be avoided. 6. DPV #1 precluded normal ram crossings during construction. Deterrence of ram crossings during construction could impact breeding, an unwarranted risk because the herd is already in decline. If construction were to take place outside the critical lambing and rutting season, construction would be limited to the months of May, June, and July. SCE has not indicated a willingness to limit construction activities to avoid all critical lambing and breeding periods for desert bighorn sheep.

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34	Gail Acheson	Bureau of Land Management Palm Springs-South Coast Field Office 690 W. Garnet Ave. PO Box 581260 North Palm Springs, CA 92258-1260 (760)251-4800	12/22/06	7. Negative impact on bighorn sheep during lambing. Mitigation measures will lower the impact. 8. Negative impacts to burrowing owls and sensitive birds. Mitigation measures will lower the impact. 9. Negative impacts on desert tortoise and tortoise habitat. Mitigation measures will lower the impact. 10. Project would diminish recreational value of the Refuge. Mitigation measures will lower the impact. 11. Irreparable and unmitigable visual impacts. Mitigation measures will lower the impacts. 12. Negative impacts to archeological sites. Mitigation measures will lower the impact.		X	7. Because of the proximity of DPV #2 to desert bighorn sheep lambing areas within the Refuge, impacts to the sheep during breeding and lambing periods would be potentially significant. In spite of the mitigation measures proposed in the FEIS and Applicant Proposed Measures (APMs), increased vehicular traffic on access and spur roads, the operation of heavy equipment, and other human disturbance in the vicinity of lambing areas could result in ewes to moving out of adjacent lambing areas, lower reproductive success, and possibly direct mortality of lambs from abandonment. The Refuge's desert bighorn sheep herd is one of the largest in the state and vital source of genetic diversity, both through emigration to nearby mountain ranges and through transplants throughout the southwest. Lambing is the most critical life history stages for bighorn sheep and with the Refuge's population in decline (a reduction of over 220 animals in the last three years) any losses caused by DPV #2 would be a significant concern for the Refuge and would impact its efforts to recover the population. Finally, recent surveys have indicated that the lamb:ewe ratio is consistently low, emphasizing the importance of undisturbed lambing areas for long-term maintenance of the herd. There is insufficient data on impacts of DPV#1 or the combination of DPV #1 and #2 to lambing. Restricting construction to outside of November-April would partially mitigate impacts to lambing, as long as construction was not during the critical breeding season (August-October). 8. There are no records of burrowing owls on the Refuge, although they may occur within suitable habitat. The proposed mitigation is considered adequate at this time. The CD will be updated to reflect this information. 9. Desert tortoises have been documented in the Livingston Hills and New Water Mountains. There is insufficient data on effects of DPV#1 and cumulative effects of DPV #1 and #2 on this population, but there is the potential for habitat fragmentation and population isolation. Tortoises occasionally move long distances of several miles and the habitat fragmentation caused by DPV #2 or the cumulative impacts of DPV #1 and #2 may preclude these movements. 10. The FEIS clearly outlines that there would be significant impacts to recreation from DPV#2. Mitigation measures implemented during construction would partially lower impacts during the summer (May – September 2008) when visitation is low. Impacts would remain significant for the recreational uses listed when construction overlaps with the Refuge's high visitation season (October – December 2008). The increased industrialization of the area degrading the quality of visual resources and noise during the operation of DPV #2 would be significant and unmitigable. It is important to note that the Service cannot accept compensatory mitigation (e.g., land acquisition or land restoration as proposed in the FEIS) to eliminate these impacts (603 FW2.11C). 11. The Service recognizes that visual impacts during construction are identified as Class III (less than significant). The Service does not disagree with this assessment for the summer months (May – September 2008), but believes that impacts to these resources during the high visitation period (October - December 2008) would be significant. Impacts during operation of DPV #2 are clearly significant based on the increased industrialization of the area and degradation of visual resources. Mitigation measures are proposed to reduce these impacts, but the Service believes that they are insufficient and impacts would remain significant for the life of the project. 12. Based on extensive surveys over the last 30 years it has been determined that the probability of impacts to archeological sites is negligible. The Services' Regional Archaeologist is in agreement with these findings. The draft CD will be updated to also reflect these findings.

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34	Gail Acheson	Bureau of Land Management Palm Springs-South Coast Field Office 690 W. Garnet Ave. PO Box 581260 North Palm Springs, CA 92258-1260 (760)251-4800	12/22/06	13. Magnetic field interference with electronic equipment. Mitigation measures will lower the impact. 14. Potential impacts to birds from transmission line collisions. Mitigation measures will lower the impact. 15. Increased public use of unauthorized roads. Mitigation measures will lower the impact. 16. Cumulative impacts to biological resources. Mitigation measures will lower the impact. 17. Mitigation measures in the Final EIR/EIS would be adopted by the CPUC and BLM.		X	13. SCE is attempting to resolve potential radio interference from DPV#1. During January 2007, SCE conducted field studies of the impact of DPV #1 on radio communications. Although no interference was recorded, SCE Radio Technicians stated that further study would be required to fully assess the potential impact of DPV #1 (as well as DPV #2) on radio communications. Emphasis will need to be placed on radio communications during the summer months when the coronal noise and potential for interference is likely to be at its highest level. Mitigation measures may reduce the impact of radio interference on the Refuge's communication system, but these measures are expected to be ineffective for radio telemetry. Therefore, potential impacts to radio tracking activities (e.g., desert bighorn sheep, and mountain lions) from DPV #1 and #2 would be significant and unmitigable. Radio interference would limit the Refuge's biologists' ability to conduct population studies with radio collars, which is a critical element of research and management to reverse the current sheep decline. The Service understands that there is conflicting scientific information on the effects of EMF. Refuge staff working in the vicinity of DPV #1 or DPV #2 should not be at a significant risk of exposure to EMF; however any measures taken by SCE to reduce EMF associated risks would be appropriate and supported. 14. Mitigation measures may lower but will not eliminate adverse impacts from bird strikes. "....The primary source of collision mortality among birds...are the small, incremental losses associated with the millions of kilometers of power and communication lines and the billions of glass windows throughout the country" (Review of Avian Mortality Due to Collisions with Manmade Structures, Michael L. Avery, 1979). A mortality rate of 1-2.5 birds per year, as suggested by some upland studies on power lines, would suggest an annual avian mortality of around 97 birds per year on the Refuge. Regardless of the magnitude of avian kill from collisions, any avian mortality is a direct violation of the Migratory Bird Treaty Act and must be addressed. 15. There is no effective way to mitigate for increased public use of unauthorized roads - gating is ineffective in open desert environments and permanent monitoring is impractical. Unauthorized vehicle use causes increased habitat fragmentation, damage to desert pavement (i.e., sparsely vegetated desert flatland totally covered with a single layer of desert-varnished rocks) and vegetation, and increases spread of invasive plants. 16. The cumulative impacts of DPV #1 and DPV #2 are unknown. There is insufficient data on impacts of DPV #1 on species other than bighorn sheep and no baseline data to conduct a thorough and adequate analysis of the impacts of DPV #2. There is no data available from other studies on the impacts of 2 powerlines operating together on any species. The lack of baseline documentation of negative impacts does not imply that cumulative impacts did not occur with DPV #1, or that additional significant cumulative impacts would not occur with the construction and operation of DPV #2. The obvious lack of data calls for a conservative assessment of the potential impacts. Cumulative impacts must also be considered in regard to other past and present disturbing actions on the Refuge, including the existing ROWs for natural gas pipelines, military overflights, mining, and increased damage from illegal use of OHVs on unauthorized ROW roads. 17. Although SCE has pledged to reduce impacts to "the extent practicable" through mitigation measures, the Service has determined that those impacts which remain cannot be mitigated to a level that the project would be compatible with Refuge purposes, nor is the project consistent with the Service's mission and goals, or pertinent agency policies.

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34	Gail Acheson	Bureau of Land Management Palm Springs-South Coast Field Office 690 W. Garnet Ave. PO Box 581260 North Palm Springs, CA 92258-1260 (760)251-4800	12/22/06	18. The BLM considered three alternative routes to avoid impacts to the Refuge. Each of these routes may not be feasible as they would create a new corridor with associated ground disturbance, new access routes, and disruption of recreation in other visitor areas, and reduction of various scenic views. 19. The CD incorrectly references the construction timeframe for the project. 20. The Service's CD incorrectly states that the project is being proposed on the Refuge to avoid impacts to lands administered by the BLM. 21. Noise will be an issue during the construction and operation of the powerline. Mitigation measures will lower impacts. 22. Air Quality impacts will be significant during construction of DPV #2. Mitigation measures will lower these impacts. 23. Methods will be employed to reduce EMF associated with DPV #2. 24. In the FEIS, impacts to wilderness were significant and unmitigable. BLM acknowledges the Service's position on wilderness in the draft CD, which does not support the findings of the FEIS, except where the ROW may be expanded beyond 130 feet. The BLM/CPUC will require additional environmental analysis, if the ROW is expanded beyond 130 feet.	X		18. The Service did not have a role in determining of the "Environmentally Preferred" route for DPV #2. The Service was not a cooperating agency in BLM's FEIS. BLM is not responsible for the stewardship of the Refuge. Therefore, BLM's finding that the installation of a 500KV powerline across the Refuge is "preferred" does not take into account the mission of the Service as it applies to the Refuge and the National Wildlife Refuge System (NWRS). Furthermore, "unless otherwise provided for in law or other legally binding directive, permitting uses of national wildlife refuges is a determination vested by law in the Service," not other Federal and/or state agencies. 65 Fed. Reg. 62484, §2.11(A)(3). If the Service had been a cooperating agency in the project, it would not have recommended selection of the Refuge segment as part of the "Environmentally Preferred" alternative because of the direct impact to wildlife and their habitats, the purposes for which that area was established and managed, and the inconsistencies of the project with the agency's legal and policy mandates. In any case, many of the environmental concerns identified for the alternative routes would be irrelevant if the area north of the Refuge is targeted for the West Wide Energy Corridor. As of December 19, 2006, the I-10 corridor north of the Refuge was the draft location for the West Wide Energy Corridor and would be a better route for DPV #2 because it would eliminate the significant and adverse impacts to the Refuge, and any adverse effects would be less than those already posed by the interstate highway. 19. The Service was incorrect in describing the construction timeframe for the project (24 month total). Although this is correct for completion of the entire project, the Refuge segment would require much less time to complete (May through December 2008). The draft CD will be corrected to reflect this information. 20. The Service incorrectly stated that the "environmentally preferred alternative" was proposed on the Refuge to avoid impacts to BLM lands. It also recognizes that the vast majority of lands impacted by the project in California and Arizona are under the jurisdiction of the BLM. The draft CD will be modified to reflect that the route across the Refuge was selected to allow the use of existing access roads and would avoid creation of a second major transmission corridor through the region. 21. The Service believes, as explained in greater detail in sections of the final compatibility determination, that noise will impact wildlife and recreational activities on the Refuge during construction and the subsequent operation of the project. Mitigation measures would not reduce these impacts to a less than significant level during a portion of the construction period (October – December 2008), or during its operation for the life of the project (50 + years). A 3 dBA increase would be double the noise that is associated with the operation of DPV #1. DPV #2 would result in a coronal noise increase up to 5 dBA once constructed. 22. The Service agrees that mitigation measures for DPV #2 would reduce air quality issues to a less than significant level, but adverse impacts would remain. These impacts are from particulate matter emissions which exceed Arizona Department of Environmental Quality Standards (PM 10 Emissions) and are for the most part generated by vehicle travel on access routes and heavy equipment at construction sites. 23. The Service understands that there is conflicting scientific information on the effects of EMF. Refuge staff working in the vicinity of DPV #1 or DPV #2 should not be at a significant risk of exposure to EMF; however any measures taken by SCE to reduce EMF associated risks would be appropriate and supported. 24. The Service's position on the impacts to wilderness is unchanged because the project has no direct affect on these resources. DPV #2 as proposed is outside wilderness, so these resources are unaffected. If the ROW is expanded beyond 130 feet, the Service agrees with the BLM statement that an additional environmental analysis would be required.

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ISSUE MATRIX FOR DRAFT COMPATIBILITY DETERMINATION
SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

#	NAME	ADDRESS or EMAIL	Date RCVD	ISSUES	N	P	AGENCY RESPONSE
35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	1. Existing 1989 CD was still valid, therefore a new CD is not needed. 2. Project will not materially interfere with conservation management of bighorn sheep, birds, and reptiles.	X		<p>1. The 1989 CD is no longer valid. The National Wildlife Refuge Administration Act of 1966 authorizes the Service to use the 1989 CD, however, the Service will re-evaluate CDs for all existing uses other than wildlife-dependent uses when conditions under which the use is permitted change significantly, or if there is significant new information regarding the effects of the use. 50 CFR §25.21. In fact, the Service can even terminate or modify an existing use when the Service determines that such a use is not compatible. "A Refuge Manager always may re-evaluate the compatibility of a use at any time." 65 Fed. Reg. 62484, §2.11(H). The Service has issued a new CD for the following reasons: a) Prior to the issuance of the 1989 CD, the Service's administrative record shows that the issue of compatibility was addressed numerous times. On nine occasions Service personnel either determined that DPV #2 was incompatible with Refuge purposes or reaffirmed this position. This evidence significantly undermines the scant justification provided in the 1989 determination by the Regional Director that the installation of DPV #2 was compatible with the mission of the Refuge; b) Prior to the issuance of a permit for DPV #1, on five occasions Service personnel either determined that DPV #1 was incompatible with Refuge purposes or reaffirmed this position; c) The Service's Final Compatibility Policy Pursuant to the National Wildlife Refuge System Improvement Act of 1997 ("Policy") became effective on November 17, 2000. 65 Fed. Reg. 62484, 603 FW 2. The promulgation of this policy occurred eleven years after the CD for DPV #2. The Policy described the process for determining whether or not a use of a national wildlife refuge was a compatible use. The Service should use the standards set out in the Policy as opposed to relying upon CDs issued prior to the formulation of the Policy; d) the proposed use in conflict with other recently issued policies including 601 FW3 Biological Integrity, Diversity and Environmental Health, 601FW 1 NWRS Mission, Goals and Refuge Purposes, 605 FW 1 Wildlife Dependent Recreation, and 603 FW1 Appropriate Refuge Uses (provided there is no existing right for the use); and e) The use is in direct conflict with the Refuge's overall Management Strategy as addressed in the 1996 Kofa National Wildlife Refuge and Wilderness and New Waters Mountains Wilderness Interagency Management Plan and Environmental Assessment (p. 29) and specifically Objective 2 (Wildlife and Habitat Management) (P. 32) and Objective 3 (Recreation, Legal Access and Public Information). 2. 603 FW 2.E provides "If information available to the Refuge Manager is insufficient to document that a proposed use is compatible, then the Refuge Manager would be unable to make an affirmative finding of compatibility". DPV #1 was shown to preclude normal ram corridor crossing during construction. There is insufficient information to declare that no impacts occurred from DPV#1 for other species or that no impacts would occur from operation of DPV #1 and #2. Based on the information presented in the FEIS, the Service believes that sheep, small mammals, birds and reptiles will be affected by DPV #2, either during construction or operation of the project.</p>

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SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

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35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	3. Current DPV #1 line does not interfere with bighorn sheep movements or lambing on the Refuge. 4. No sensitive reptiles were found in the project area. 5. DPV #1 has not been shown to cause any significant bird mortality due to collision.	X		3. SCE's account of the construction impacts to ram crossings is inaccurate. In Smith et al.'s (1986) DPV #1 study, more than one ram was affected. The study found that transmission line construction activities precluded normal ram crossing between the New Water Mountains, Kofa Mountains and Livingston Hills. Preventing ram crossings for even the short construction period could be detrimental to the herd by interrupting breeding activities during the late summer and fall. Ultimately, this disruption could have long-term impacts on a population already in decline and affect current recovery efforts on the Refuge. The findings about the Dome Rock herd regarding the impacts of the operation of DPV #1 are inapplicable to the Refuge herd because escape terrain is immediately available on both sides of Copper Bottom Pass, which is far more favorable to crossing than the conditions that exist on the Refuge. SCE has relied on this information in its analysis of the potential impacts on the Refuge. The Refuge has never indicated that there is evidence that the operation of DPV #1 has precluded normal sheep crossings, but the operation of DPV#1 and #2 together could have this effect. Baseline data does not exist to accurately assess this issue with any certainty, so the Service must err on the side of caution when determining its significance on the Refuge's bighorn sheep herd. The FEIS indicates that the Proposed Project would be within 0.6 miles, not one mile, of the nearest lambing ground. No data specific to the powerline impacts on lambing were ever reported in the study of DPV #1. The study reported summary statistics for lambing but no analysis in regard to the powerline was performed. It is true that the data did not document any change in home range or unusual responses by ewes to the construction and operation of DPV#1, but there are no data to support SCE's other claims that there are no impacts to lambing areas. Given the recent decline of the bighorn herd, subjecting sheep to the noise and disturbance created by powerline construction would not be in the best interest of desert bighorn sheep conservation on the Refuge. 4. Desert tortoise, Gila monster, and rosy boa have all been found in the general vicinity of the project. The Refuge documented desert tortoise populations in the Livingston Hills and New Water Mountains (1.0 and 0.6 miles from DPV #2, respectively) in the 1990s. Tortoises occasionally move several miles and the impacts of the first powerline on these populations are undetermined. New tower sites, spur roads and ground disturbance may still cause habitat fragmentation and genetic isolation for small mammals and reptile. There are numerous species that could be affected by DPV #2. 5. There is no data on impacts of DPV #1 to migratory birds (e.g. neotropical migrants) on the Refuge. However, this does not indicate that no impacts have occurred following the project's completion in 1981. No studies were ever performed and carcasses of small birds that may have collided with towers or lines disappear quickly from scavenging and weathering in the desert environment. The cumulative impacts of DPV #1 and DPV #2 will likely cause greater impacts to migratory birds than DPV #1 alone. As SCE points out, evidence of conflicts between birds and 500kV lines is limited, likely because this kind of data is difficult to obtain. However, it is reasonable to assume that collision would occur and could adversely affect bird populations.

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ISSUE MATRIX FOR DRAFT COMPATIBILITY DETERMINATION
SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

#	NAME	ADDRESS or EMAIL	Date RCVD	ISSUES	N	P	AGENCY RESPONSE
35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	6. Alternative routes will cause more wildlife disturbance. 7. Mitigation measures will lower impacts to a less than significant level. 8. Draft CD addresses impacts not related to the purposes of the Refuge or the mission of the NWRS. The agency completed the CD outside its statutory authority. 9. DPV #2 is consistent with the Refuge & Wilderness and New Water Mountains wilderness interagency management plan and environmental assessment (Management Plan).	X		6. Laws, regulations, and policies applicable to CDs do not require the Service to analyze impacts to areas outside of the Refuge in making the determination of compatibility. The Service does not have the authority to make decisions regarding lands managed by other agencies. Also, the Service was not a cooperating agency in the process to determine the "Environmentally Preferred" Alternative. Many of the environmental concerns about alternative routes will be irrelevant if the area north of the Refuge is targeted for the West Wide Energy Corridor. The I-10 corridor north of the Refuge was the draft location for the West Wide Energy Corridor as of December 19, 2006. 7. Although SCE has pledged to reduce impacts to "the extent practicable" through mitigation measures, the Service has determined that those impacts which remain cannot be mitigated to a level that the project would be compatible with Refuge purposes, nor is the project consistent with the Service's mission and goals (601 FW 1), or pertinent agency policies such Biological Integrity, Diversity and Environmental Health (601 FW 3), Appropriate Uses (603 FW 1), or Wildlife Dependent Recreation (605 FW 1). 8. The Service considered all applicable legal and policy requirements in completing its CD for DPV #2, including 601 FW 1 NWRS Mission, Goals and Refuge Purposes, 601 FW 3 Biological Integrity, Diversity and Environmental Health, 605 FW 1 Wildlife Dependent Recreation, and 603 FW 1 Appropriate Refuge Uses. Inclusion of the above in a CD are clearly supported by the Service's policy on Compatibility (603 FW 2) and based in law, specifically the NWRS Administration Act of 1966 (16 U.S.C. §668dd-668ee), as amended. Other applicable laws that were considered in the preparation of this CD included the National Historic Preservation Act, 16 U.S.C. §470 et. seq., the Archaeological Resources Protection Act, 16 U.S.C. §470aa et. seq., and the Native American Graves Protection and Repatriation Act, 25 U.S.C. § 3001. 9. A Refuge Manager "should deny a proposed use without determining compatibility" if the proposed use conflicts with the goals or objectives in an approved refuge management plan (e.g., comprehensive conservation plan, comprehensive management plan, master plan or step-down management plan)." 65 Fed. Reg. 62489, §2.10(D)(c). Through his analysis of DPV #2, the Refuge Manager has determined that the proposed use is in direct conflict with the Refuge's overall Management Strategy as addressed in the 1996 Kofa National Wildlife Refuge and Wilderness and New Waters Mountains Wilderness Interagency Management Plan and Environmental Assessment (p. 29), and specifically Objective 2 (Wildlife and Habitat Management) (P. 32), and Objective 3 (Recreation, Legal Access and Public Information) (P.35).

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ISSUE MATRIX FOR DRAFT COMPATIBILITY DETERMINATION
SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

#	NAME	ADDRESS or EMAIL	Date RCVD	ISSUES	N	P	AGENCY RESPONSE
35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	10. Executive Order 13211 requires consideration of impacts federal decision on energy distribution. 11. Project impacts were not accurately characterized. 12. Project impacts must be based upon the existing environmental baseline.	X		10. The Service has considered the effects of this compatibility determination on energy distribution. The Service has held numerous meetings with SCE and the California Public Utilities Commission and reviewed numerous energy distribution documents that discuss energy distribution concerns if DPV #2 is found incompatible with the NWRS mission and Refuge purposes. The Final Environmental Impact Statement states "No new generation or major transmission facilities would be required if the DVP2 project is not constructed" (p. C-56); and also that "...DVP #2 is primarily driven by SCE's desire to reduce energy costs to California customers, not by a need for improved reliability" (p. C-53). The reported "critical" nature of DPV#2 does not automatically lead USFWS to conclude that DPV #2 is compatible with Refuge purposes. In and of itself, the Service's compatibility determination does not have a significant adverse effect on the supply, distribution, or use of energy. There are other alternatives to routing DPV #2 available to SCE. The drafting and issuance of the Service's CD has not had an adverse effect on the timeliness of the permitting process required by SCE because SCE must still receive permits and other grants of authority from other state and Federal agencies. As of the time of the issuance of the draft CD, SCE had still not received all requisite permits and grants of authority. In summary, we do not believe the CD is in conflict with Executive Order 13211. 11. Project impacts were accurately characterized in the CD. The Refuge Manager utilized the FEIS to summarize the impacts of the use and to supplement his "sound professional judgment" in determining whether or not the proposed use meets the mission and goals of the NWRS and Refuge purposes. The Refuge Manager will ensure that critical mitigation measures outlined in the FEIS are adequately referenced under each resource category in the final CD. 12. The Service considered the environmental baseline which already includes a powerline (DPV #1) crossing the Refuge. According to the Policy, "when considered separately, a use may not exceed the compatibility threshold, but when considered cumulatively in conjunction with other existing or planned uses, a use may exceed the compatibility threshold." The Service determined that an additional 500kV powerline running across the Refuge (DPV #2), through an area used by the American public for wildlife-dependent recreation, and through an area providing critical wildlife habitat for a nationally significant species such as desert bighorn sheep and other important desert-dwelling species in the Sonoran Desert Ecosystem, when taken in conjunction with DPV #1 and other industrial infrastructure, is incompatible with wildlife dependent recreation, which means it does nothing to enhance the American public's opportunity to develop an appreciation for fish and wildlife. "Compatible wildlife-dependent recreational uses (e.g. hunting, wildlife observation) are the priority general public uses of the [National Wildlife Refuge] System and shall receive priority consideration in Refuge planning and management." 16 U.S.C. §668dd(a)(3)(C). The importance of wildlife-dependent recreational use is evidenced in the numerous public comments to the draft compatibility determination that support the Service's draft decision that permitting DPV #2 will be incompatible with the NWRS mission and Refuge purposes. The addition of DPV #2 does nothing to ensure that the mission essential elements of biological integrity, diversity, and environmental health of the NWRS are maintained for the benefit of present and future generations of Americans. Furthermore, the construction of DPV #2 on the Refuge does not contribute to the conservation of the ecosystems of the United States because it destroys plant life, disturbs fragile soils, fragments wildlife habitats, causes additional noise, and more likely than not will harm wildlife.

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ISSUE MATRIX FOR DRAFT COMPATIBILITY DETERMINATION SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

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35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	13. The FEIR/EIS conclude that no known National Register of Historic Places (NHRP) eligible cultural/historical sites of significance are within the Refuge Area of Potential Affect (APE). 14. Mitigation measures were not properly considered in determining compatibility. 15. The draft CD identified less than significant impacts that can be addressed in a ROW stipulation. 16. If a NEPA analysis were used, the service should have considered impacts to other alternative routes and properly evaluated cumulative impacts. 17. The potential impacts of DPV #2 are minor. 18. The appropriate use policy is irrelevant to the DPV #2 CD. 19. In reference to the Refuge's Comprehensive Management Plan, 50 CFR 29.21 is the guidance for right-of- ways outside wilderness and no additional guidance is required.	X		13. Based on extensive surveys over the last 30 years it has been determined that the probability of impacts to archeological sites is negligible. The Services' Regional Archaeologist is in agreement with these findings. The draft CD will be updated to reflect these findings. 14. Mitigation measures found in the FEIS were properly considered in this compatibility determination. The Service used the proponents analysis of impacts along with sound professional judgment to determine whether or not a particular mitigation measure, or group of measures would be 1) ineffective in reducing the impact, and therefore significant and/or potentially unmitigable; 2) effective in reducing the impact to a level less than significant, but still adverse; 3) effective in minimizing the impact to a level acceptable for management of the affected resource; or 4) effective in eliminating the impact to the resource altogether, and consequently no longer a concern to its management. The Service has used the BLM's FEIS to supplement the "sound professional judgment" of the Refuge Manager in determining whether or not the proposed use meets the purposes of the Refuge and the mission of the NWRS. The Service also believes that is also appropriate to reference the mitigation measures implemented in the CD as these measures were used to determine the projected level of impact of the activity or action and its significance to the resource under consideration. 15. If the Service's current position on DPV #2 were reversed, and a right-of way permit issued for the project, then mitigation measures directed by the BLM/CPUC would be included in the Service's realty permit for the project (similar to DPV #1). 16. In 603 FW 2, the CD process does not require NEPA or the analysis of alternatives in its development. Alternative routes considered outside the Refuge in the FEIS are not required to be analyzed as part of the Refuge Manager's decision-making process. 17. The potential impacts of DPV #2 are not minor. The project would disturb approximately 100 acres of wildlife habitat , preclude normal bighorn sheep crossing during construction and further isolate populations, disturb bighorn sheep breeding activities during the breeding season, and disturb 5 Partners in Flight indicator species nesting and foraging in washes within the ROW. Ground disturbance could exacerbate invasive species problems along pipeline road and spur roads, and 85 additional towers and associated powerlines would further fragment, degrade and industrialize the landscape impacts, affecting the quality of recreation and visual resources. The greatest impact would be the cumulative impacts on all the resources listed above from the construction and operation of DPV #2. The incremental affects of the second powerline are anticipated to be significant and irretrievable commitments of Refuge resources. 18. The Appropriate Use Policy is not the basis of the Service's non-compatibility determination and it is relevant. The Service recognizes that rights-of-way will continue to be handled through the compatibility and ROW permit processes and not the Appropriate Use Policy. However, the Appropriate Use Policy clarifies the compatibility policy, and therefore may be used for those purposes. The Service agrees that the proposed use may not be found non-compatible based upon the Appropriate Use Policy alone. 19. The Service recognizes that 50 CFR 29.21 is the primary guidance for rights-of-way on Service lands. However, an integral part of considering any proposed ROW on Service lands is determining whether or not the use is compatible with Refuge purposes and the mission and goals of the NWRS. These can be prepared as stand-alone documents as in the case of DPV #2, or as part of larger planning effort (e.g., a Comprehensive Management Plan) for the Refuge. A CD is applicable for any new ROW and at the end of the ROW term. The Service will use the CD for periodic re-evaluations of (ROWs) to ensure compliance with the terms and conditions in the realty permit for the use.

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SOUTHERN CALIFORNIA EDISON-DEVERS PALO VERDE #2

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35	Nino J. Mascolo	Southern California Edison 2244 Walnut Grove Ave. Rosemead, CA 91770 (626)302-4459 nino.mascolo@sce.com	12/22/06	20. A broad-based analysis is inappropriate for a CD. 21. Congress intended to allow SCE_DPV #2. 22. The Schultz Hanford Area Transmission Line at Columbia NWR should be used as a model for DPV #2. 23. The Refuge Manager should consider the use of the VS-VC method over the BLM's VRM method in analyzing visuals impacts from DPV #2.		X	20. The Service disagrees with this comment. A Refuge Manager is required and authorized to exercise "sound professional judgment" in preparing a CD. CDs are inherently complex and require the Refuge Managers to consider their field experiences and knowledge of a Refuge's resources, particularly its biological resources, and make conclusions that are consistent with principles of sound fish and wildlife management and administration, available scientific information, and applicable laws. 65 Fed. Reg. 62489, §2.11(A). In light of this and pursuant statute, regulation and Service policy, the Refuge Manager has appropriately relied upon his 19 years of experience with the Service, the knowledge of his staff, administrative record documents applicable to this issue, personal knowledge of the Refuge and its resources, knowledge of the NWRS, and all other available resources to prepare this CD. 21. Based on a review of documents provided by SCE (amendments to the Arizona Desert Wilderness Act of 1990), the Service and its attorneys believe that it was Congress' intent to exclude 100 acres from wilderness designation at the Refuge to avoid conflicts with wilderness. We do not believe it was Congress' express intent to authorize DPV #2 through these amendments. 22. At CNWR the Refuge Manager determined that the addition of 150' width to an existing 100' wide and half-mile long ROW, combined with the installation of two 500KV single-circuit steel towers, was compatible with the NWRS mission. Given the differences in scope of the proposed uses between the Refuge and CNWR and differences in flora, fauna, landscape, and uses, the Refuge cannot reasonably compare the two CDs. 23. The Refuge Manager is familiar with the VRM methodology adopted by the BLM and satisfied with its application in the FEIS to analyze and determine visual resource impacts within the Refuge segment of DPV #2. In addition, the use of the VRM methodology was the decision of BLM/CPUC, not the Service.

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36	Sandy Bahr	Sierra Club-Grand Canyon Chapter	12/26/06	1. Project is incompatible with the Refuge's mission. 2. A new powerline is not appropriate use pursuant to the Appropriate Uses Policy. 3. Negative impacts to native plants. 4. Introduction of non-native plants. 5. Negative impacts on visual values of the Refuge. 6. Negative impacts on birds. 7. Negative impacts on wildlife habitat. 8. Project will diminish recreational value of the Refuge. 9. Noise of additional powerline is incompatible.			X Comments consistent with the draft CD. No further action required.
37	Carey Meister	Yuma Audubon Society	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
38	Kevin Gaither-Banchoff	Arizona Wilderness Coalition	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
39	Justin Augustine	Center for Biological Diversity	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
40	Bob Witzeman	Maricopa Audubon Society	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
41	Noah Matson	Defenders of Wildlife	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
42	Daniel R. Patterson	Public Employees for Environmental Responsibility (PEER)	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.
43	Kim Crumbo	Grand Canyon Wildlands Council	12/26/06	Refer to # 36 above.			X Comments consistent with the draft CD. No further action required.

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44	Ron Kearns	krss1@yahoo.com	12/26/06	1. "The SCE powerline must not be allowed."		X	Comments consistent with the draft CD. No further action required.
45	Kathryn Dankwort	8121 N. 8th Ave Phoenix, AZ 85021-5634 rdankwort@cox.net	12/27/06	1. "...a proposed second transmission line through the Refuge, bringing further havoc to wildlife of all kinds."		X	Comments consistent with the draft CD. No further action required.
46	Raymond Varney	rnvarney@intergate.com	12/28/06	1. "I heartily concur with your assessment and judgment of non-compatibility. 2. "...one of BLM's purposes is to provide for the nation's energy needs. The powerline fits better within their objectives than it does on a NWR."		X	Comments consistent with the draft CD. No further action required.
47	Jon Findley	jonaz@learnweb.com	12/29/06	1. Destruction of pristine desert landscape. 2. Irreparable and unmitigable visual impacts. 3. Project would diminish recreational values of the Refuge.		X	Comments consistent with the draft CD. No further action required.
48	Larry J. Thoney	PO Box 31 Wickenburg, AZ 85390	1/8/07	1. Negative impacts to bighorn sheep. 2. Incompatible with the Refuge's mission.		X	Comments consistent with the draft CD. No further action required.
49	Bill Bowling	bbowling2@cox.net	1/4/07	1. Negative impacts on birds.		X	Comments consistent with the draft CD. No further action required.

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